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Hon. Ona T. Wang
United States Magistrate Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

March 12, 2025

MEMO ENDORSED.

Application GRANTED. The below-briefing schedule is adopted.

SO ORDERED.

Hon. Judge Wang:

Ona T. Wang
U.S.M.J.

Mar. 14, 2025

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to file Plaintiff's Brief in this matter, to May 19, 2025. Plaintiff's Brief is currently due on March 20, 2025; however, Plaintiff cannot complete the Brief on time for the reasons detailed below.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to prepare Plaintiff's brief properly and thoroughly. For instance, between March 7, and May 16, 2025, staff in Counsel's office have one hundred and sixty-six (166) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue hardship. This extension is needed to prepare the brief thoroughly and properly.

Plaintiff's counsel has contacted defense counsel who kindly consents to this request and has agreed to the below briefing schedule. This request will not cause Defendant any undue hardship. The parties have agreed on the briefing schedule below. This would be a first request for an extension of time in this matter.

If Plaintiff's request is granted, the new briefing schedule would be:

- **Plaintiff's Brief is due on or before May 19, 2025;**
- **Defendant's Brief is due on or before July 18, 2025; and**
- **Plaintiff's Reply Brief, if any, is due on or before August 1, 2025.**

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Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.
Counsel for Plaintiff

CC [via ECF]: Heetano Shamsoonar, Esq., Attorney for Defendant

SO ORDERED.

Dated: _____

U.S. Magistrate Judge